

UNITED STATES DISTRICT COURT

for the

Middle District of North Carolina

United States of America

v.

Voneric Laquane PRIMUS

Case No. 1:18-mj-180

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2, 2018 - June 6, 2018 in the county of Scotland in the
Middle District of North Carolina, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 922(g)(1)	Felon in possession of a firearm

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.


Complainant's signature

Senior Special Agent Adam M. Cameron

Printed name and title

Sworn to before me and signed in my presence.

Date: 6/15/2018

City and state: Winston-Salem, N.C.


Judge's signature

Hon. Joi Elizabeth Peake U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
AFFIDAVIT IN SUPPORT OF COMPLAINT(S)
AND WARRANT(S) FOR ARREST

I, Adam Cameron, having been duly sworn according to law, depose and state that:

1. Affiant is a Senior Special Agent with the Department of Justice (DOJ), Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). Affiant has been so employed since June of 1999 and is currently assigned to the Fayetteville, North Carolina Field Office within the Charlotte, North Carolina Field Division.
2. Affiant's duties include, but are not limited to, enforcing the federal firearms laws as well as other laws committed in violation of federal statutes. During your affiant's employment with ATF, affiant has conducted and assisted in numerous felony firearm, narcotic, and arson investigations. Your Affiant is also a certified interstate nexus examiner. I completed specialized training in identification of firearms and their place(s) of origin in or about September 2010.

3. As a result of your affiant's training and experience as an ATF Senior Special Agent, your affiant is familiar with federal criminal laws, and has participated in the investigations of criminal violations of federal law, including, but not limited to Title 18 United States Code Section 922(g)(1).
4. This affidavit is submitted for the limited purpose of establishing probable cause that Voneric Laquane PRIMUS (hereinafter "PRIMUS"), having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm as a convicted felon, in the Middle District of North Carolina, in violation of Title 18, United States Code, Section 922(g)(1).
5. This affidavit is also submitted for the limited purpose of establishing probable cause that Tony Devonta EVERETTE (hereinafter "EVERETTE") having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm as a convicted felon, in the Middle District of North Carolina, in violation of Title 18, United States Code, Section 922(g)(1).
6. Information contained within this affidavit is based upon information from this Affiant's investigation, personal observations, training and experience, as well as information relayed to this Affiant by other law enforcement officers and or agents.

PROBABLE CAUSE

FIRST PURCHASE OF DRUGS AND A FIREARM FROM PRIMUS

7. On May 2, 2018, with the use of an ATF Confidential Informant (CI) numbered 10121, Investigators purchased one ounce, approximately 29 grams, of cocaine base ("crack") in a small clear plastic bag and one (1) Metro Arms Corporation, Model American Classic II, .45-caliber pistol, serial number A13-07201 loaded with nine rounds of ammunition, from PRIMUS. The CI making the purchase, officers conducting visual surveillance, and officers reviewing images from recordings of the purchase all confirm that PRIMUS was the seller of the aforementioned items.
8. The purchased cocaine base ("crack") field-tested positive for the presence of cocaine base. The controlled purchase from PRIMUS was audio and video recorded.

SECOND PURCHASE OF DRUGS AND A FIREARM FROM PRIMUS

9. On May 9, 2018, with the use of an ATF Confidential Informant (CI) numbered 10121, Investigators purchased one (1) Smith and Wesson, Model M&P45, .45-caliber pistol, serial number DXV0682 loaded with ten rounds of ammunition and one ounce, approximately 29 grams, of

powder cocaine in a small clear plastic bag and approximately one ounce, 27 grams, of cocaine base ("crack") in a small clear plastic bag, from PRIMUS. The CI making the purchase, officers conducting visual surveillance, and officers reviewing images from recordings of the purchase all confirm that PRIMUS was the seller of the aforementioned items.

10. The purchased powder cocaine and cocaine base ("crack") each field-tested positive for the presence of cocaine HCL and cocaine base respectively. The controlled purchase from PRIMUS was audio and video recorded.

THIRD PURCHASE OF DRUGS AND A FIREARM FROM PRIMUS

11. On May 16, 2018, with the use of an ATF Confidential Informant (CI) numbered 10121, Investigators purchased one (1) Glock, Model 27, .40-caliber pistol, serial number GCG551, with an extended capacity magazine loaded with six rounds of ammunition; two ounces, approximately 58 grams, of cocaine base ("crack") in a small clear plastic bag and two additional SBM Tactical, high capacity .40 caliber pistol magazines. The CI making the purchase, officers conducting visual surveillance, and officers reviewing images from recordings of the

purchase all confirm that PRIMUS was the seller of the aforementioned items.

12. The purchased cocaine base ("crack") field-tested positive for the presence of cocaine base. The controlled purchase from PRIMUS was audio and video recorded.

FOURTH PURCHASE OF DRUGS AND A FIREARM FROM PRIMUS

13. On May 23, 2018, with the use of an ATF Confidential Informant (CI) numbered 10121, Investigators purchased one (1) Rossi, Model 713, .357-caliber revolver, serial number F071729 loaded with six rounds of ammunition and approximately 29 grams of cocaine base ("crack") in a clear plastic bag, from PRIMUS. The purchases of the firearm and cocaine base ("crack") from PRIMUS occurred sequentially at two different locations in Laurinburg, North Carolina. The CI making the purchases, officers conducting visual surveillance, and officers reviewing images from recordings of the purchase all confirm that PRIMUS was the seller of the aforementioned items.

14. The purchased cocaine base ("crack") field-tested positive for the presence of cocaine base. The controlled purchases from PRIMUS were audio and video recorded.

FIFTH PURCHASE OF DRUGS AND A FIREARM FROM PRIMUS

15. On May 30, 2018, with the use of an ATF Confidential Informant (CI) numbered 10121, Investigators purchased one (1) Taurus, Model 85 UltraLite, .38-caliber revolver, serial number FW43987 loaded with five rounds of ammunition and two ounces, approximately 57 grams, of cocaine base ("crack") in a small clear plastic bag, from PRIMUS. The CI making the purchase, officers conducting visual surveillance, and officers reviewing images from recordings of the purchase all confirm that PRIMUS was the seller of the aforementioned items.

16. The purchased cocaine base ("crack") field-tested positive for the presence of cocaine base. The controlled purchases from PRIMUS were audio and video recorded.

SIXTH PURCHASE OF DRUGS AND A FIREARM FROM PRIMUS

17. On June 6, 2018, with the use of an ATF Confidential Informant (CI) numbered 10121, Investigators purchased one Smith and Wesson, Model 28, .357-caliber revolver, serial number N6368; one Jimenez Arms, Model J.A. 380, .380-caliber pistol, serial number 268758, and two ounces, approximately 57 grams, of cocaine base ("crack") in a small clear plastic bag. The CI making the purchase, officers conducting visual

surveillance, and officers reviewing images from recordings of the purchase all confirm that PRIMUS was the seller of the aforementioned items.

18. The purchased cocaine base ("crack") field-tested positive for the presence of cocaine base. The controlled purchases from PRIMUS were audio and video recorded.

FIRST PURCHASE OF DRUGS FROM EVERETTE

19. On April 18, 2018, with the use of an ATF Confidential Informant (CI) numbered 10121, Investigators purchased one ounce, approximately 29 grams, of cocaine in a small clear plastic bag, from EVERETTE. The CI making the purchase, officers conducting visual surveillance, and officers reviewing images from recordings of the purchase all confirm that EVERETTE was the seller of the aforementioned item.

20. The purchased cocaine field-tested positive for the presence of cocaine. The controlled purchases from EVERETTE were audio and video recorded.

SECOND PURCHASE OF DRUGS AND A FIREARM FROM EVERETTE

21. On April 25, 2018, with the use of an ATF Confidential Informant (CI) numbered 10121, Investigators purchased one Smith and Wesson, Model US Army 1917, .45-caliber revolver, serial number 127182 and one ounce, approximately 29 grams, of cocaine base ("crack") in a small clear plastic bag. The CI making the purchase, officers conducting visual surveillance, and officers reviewing images from recordings of the purchase all confirm that EVERETTE was the seller of the aforementioned items.
22. The purchased cocaine base ("crack") field-tested positive for the presence of cocaine base. The controlled purchases from EVERETTE were audio and video recorded.

THIRD PURCHASE OF DRUGS AND A FIREARM FROM EVERETTE

23. On May 18, 2018, with the use of an ATF Confidential Informant (CI) numbered 10121, Investigators purchased one Smith and Wesson, Model Bodyguard 380, .380-caliber pistol, serial number EAZ8676 loaded with fourteen rounds of ammunition; approximately twenty grams of cocaine base ("crack") and 29 grams of powder cocaine in a small clear plastic bag. The CI making the purchase, officers conducting visual surveillance, and officers reviewing images from

recordings of the purchase all confirm that EVERETTE was the seller of the aforementioned items.

24. The purchased cocaine base ("crack") and cocaine field-tested positive for the presence of cocaine base and cocaine respectively. The controlled purchases from EVERETTE were audio and video recorded.

25. As an ATF Nexus Examiner, I advised that, based upon my knowledge and research, the Metro Arms Corporation, Model American Classic II, .45-caliber pistol, serial number A13-07201; Smith and Wesson, Model M&P45, .45-caliber pistol, serial number DXV0682; Glock, Model 27, .40-caliber pistol, serial number GCG551; Rossi, Model 713, .357-caliber revolver, serial number F071729; Taurus, Model 85 UltraLite, .38-caliber revolver, serial number FW43987; Smith and Wesson, Model 28, .357-caliber revolver, serial number N6368; Jimenez Arms, Model J.A. 380, .380-caliber pistol, serial number 268758; Smith and Wesson, Model US Army 1917, .45-caliber revolver, serial number 127182 and Smith and Wesson, Model Bodyguard 380, .380-caliber pistol, serial number EAZ8676 are firearms as defined in Title 18, United States Code 921(a)(3), and that these firearms were not manufactured in the State of North Carolina. Therefore, it was the opinion of your Affiant that the firearms must have traveled in, and

thereby affected, interstate and/or foreign commerce, if they were received or possessed in the State of North Carolina.

26. A record search revealed that PRIMUS was convicted of Discharging a Weapon Occupied Property, North Carolina Annotated § 14-34.1 (A), a felony, in Scotland County, North Carolina on December 7, 2010. PRIMUS received a sentence for a term of imprisonment exceeding one year.

27. A record search revealed that EVERETTE was convicted of Possession of a firearm by a convicted felon, North Carolina Annotated § 14-415.1, a felony, in Scotland County, North Carolina on February 16, 2012. EVERETTE received a sentence of imprisonment for a term exceeding one year.

CONCLUSION.

28. Based on the above information, your Affiant believes that probable cause exists that on or about May 2, 2018, May 9, 2018, May 16, 2018, May 23, 2018, May 30, 2018 and June 6, 2018 in the Middle District of North Carolina, that PRIMUS, having been convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed a firearm as a convicted felon, in the Middle District of North Carolina, in violation of Title 18, United States Code, Section 922(g)(1).

29. Your Affiant additionally believes that probable cause exists that on or about April 25, 2018 and May 18, 2018, in the Middle District of North Carolina, that EVERETTE, having been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm as a convicted felon, in the Middle District of North Carolina, in violation of Title 18, United States Code, Section 922(g)(1).

Respectfully Submitted,



Adam M. Cameron
Senior Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Subscribed and sworn to before me
on this, the 15 day of June, 2018



Joi Elizabeth Peake
THE HONORABLE JOI ELIZABETH PEAKE
UNITED STATES MAGISTRATE JUDGE